

MEMO ENDORSED

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/7/24

May 6, 2024

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
40 Foley Square
New York, NY 10007

**Re: United States v. Juan Mercado
24 CR 279 (VEC)**

Dear Judge Caproni:

I, along with Akane Fujiwara, represent Juan Mercado in the above-referenced matter. Bail was set in Magistrate Court by Magistrate Judge Cave at the time of Mr. Mercado's presentment. Travel was restricted to the Southern District and Eastern District of New York. Mr. Mercado is requesting a temporary modification to his bail to allow him to travel this weekend to Bethlehem and Allentown, Pennsylvania by car to see his children and visit his mother's grave for Mother's Day. He would be leaving early Saturday on May 11, 2024 and returning Sunday, May 12, 2024. He would be staying with his daughter at her address, which has been provided to Pretrial Officer Marnie Gerardino, who has no objection to this request. I have spoken with AUSA Jerry Fang who has informed me that the Government has no objection to this application as long as the itinerary has been provided to pretrial services.

Accordingly, I respectfully request that Juan Mercado have a temporary bail modification to permit him to travel to Pennsylvania on May 11th and return on May 12th.

Respectfully Requested,

/s/

Harvey Fishbein

cc: All parties (via ECF)
Pretrial Officer Marnie Gerardino (via email)

Application GRANTED. Mr. Mercado must provide Pretrial Services with the address of where he will be staying.

SO ORDERED.

5/7/24

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE